

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

)  
Chandra Cook on behalf of herself )  
and all others similarly situated, )  
Plaintiff, ) CASE NO. 1:13-CV-03518  
)  
v. ) JURY TRIAL DEMANDED  
)  
Darius Mitchell and Paul Hicks )  
doing business as Pleasers. )  
Defendants. )

**JOINT NOTICE OF TENTATIVE SETTLEMENT AND MOTION TO STAY  
CASE FOR THIRTY (30) DAYS IN ORDER TO CONSUMMATE SAME**

NOW COME the parties, by and through their respective undersigned Counsel, and hereby give notice that the parties have reached a tentative settlement of this action. More specifically, Defendant has offered a sum certain, and a majority of the 42 named and opt-in Plaintiffs have agreed to the sum offered.

To date, not every named and/or opt-in Plaintiff has expressly consented to the tentative settlement. The parties jointly request, therefore, that this matter be stayed for a period of thirty (30) days, during which period the parties will diligently attempt to consummate the settlement and submit an appropriate motion seeking the Court's approval of same, or, in the event that unanimous consent cannot be achieved, to present an alternative framework to the Court for bringing this matter to a conclusion.

Respectfully submitted this 9th day of July, 2015.

/s/ Harlan S. Miller

Harlan S. Miller  
Georgia Bar No. 506709  
Of Counsel  
Parks, Chesin & Walbert, P.C.  
75 14th Street  
Suite 2600  
Atlanta, Georgia 30309  
(404) 931-6490  
hmiller@pcwlawfirm.com

/s/ Frederick L. Warren

Frederick L. Warren  
Georgia Bar No. 738350  
Ford & Harrison, LLP  
271 17th Street  
Suite 1900  
Atlanta, Ga., 30363  
(404) 888-3828  
rwarren@fordharrison.com

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing has been prepared using Times New Roman 14 point font.

This 9th day of July, 2015.

*/s/ Harlan S. Miller*  
Harlan S. Miller  
Of Counsel  
Parks, Chesin & Walbert, P.C.  
75 14th Street, 26th Floor  
Atlanta, Georgia 30309